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6 Attorneys for Richard Schell and Mamie Schell

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

PACIFIC GAS AND ELECTRIC
COMPANY

Debtors.

Affects PG&E Corporation

Affects Pacific Gas & Electric

■ Affects Both Debtors

*All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

) Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

) (Jointly Administered)

) DECLARATION OF RICHARD SCHELL
) IN SUPPORT OF MOTION PURSUANT
) TO FEDERAL RULE OF BANKRUPTCY
) PROCEDURE 9006(b)(1)
) TO DEEM CLAIM TIMELY FILED

Date: Febuary 15, 2022

) Time: 10:00 a.m.

) Place: To Be Held Telephonically
United States, D.C.

) United States Bankruptcy Cour
) Courtoom 17
) 450 Golden Gate Avenue, 16th Fl.

) 450 Golden Gate Avenue,
San Francisco, CA

) Judge: San Francisco, CA
Honorable Dennis Montali

Objection Deadline: February 8, 2022

I, Richard Schell, hereby declare and state as follows:

1. This declaration is based upon my personal knowledge unless otherwise indicated. If called upon to testify as to the matters stated herein, I could and would competently do so.
2. At the time of the Camp Fire I was living at 5788 Bonnie Lane, Paradise, California 95969 with my wife Mamie Schell. I was 80 years old, and Mamie was 77 years old at the time of the fire.

3. As a result of the fire, my house was a total loss including all of the trees and

landscape. We lost everything. We were emotionally devastated.

4. Immediately after the fire my wife and I went and lived with family in Durham, CA. We stayed in their home for approximately one month. We then bought a 5th wheel trailer and stayed on the Durham property for approximately two years until we were able to find a house in Durham.

5. The fire took a toll on both myself and Mamie mentally. Mamie was diagnosed with Dementia in mid 2018, just a few months before the fire. After the fire Mamie had a mental breakdown in late 2019. She was admitted to Amber Grove in Chico for 7 months for various mental and memory issues.

10 6. In mid 2020, Mamie came home. I was her caretaker. She progressively got worse
11 and as of approximately October of 2021 was again admitted to Amber Grove, Chico. Her
12 Dementia had become very severe.

13 7. I heard about a claim process against Pacific Gas & Electric sometime after the fire. I
14 was under the impression from information I was told by others that since I had insurance, I could
15 not assert a claim. When I finally settled with my insurance and learned I could place a claim for
16 damages not paid by insurance company, it was well past the claim filing deadline. My insurance
17 only paid a small portion of all my losses.

18 8. Due to the fire, trying to find a new home, taking care of my wife and misinformation,
19 I failed to file a timely claim. It was not until recently I learned I could request the Bankruptcy
20 Court to allow me to file a late claim for my losses.

22 I declare under penalty of perjury under the laws of the State of California and the United
23 States that the foregoing is true and correct.

Executed at Durham, California, on January 13, 2022.

— DocuSigned by:

Richard Schell

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